

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CF 135 FLAT LLC, CF 135 WEST MEMBERS  
LLC, and THE CHETRIT GROUP, LLC,

Interpleader Plaintiffs,

-against-

TRIADOU SPV S.A. and CITY OF ALMATY, a  
foreign city,

Interpleader Defendants.

No. 15-CV-05345(AJN)

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CITY OF ALMATY, KAZAKHSTAN and BTA  
BANK JSC,

Crossclaim Plaintiffs,

-against-

MUKHTAR ABLYAZOV, VIKTOR  
KHRAPUNOV, ILYAS KHRAPUNOV, and  
TRIADOU SPV S.A.,

Crossclaim Defendants.

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**DECLARATION OF JOHN P. CURLEY**

I, JOHN P. CURLEY, hereby declare under penalty of perjury that the following is true  
and correct:

1. I am an attorney admitted to practice in the State of New York and before this  
Court, and I am a partner with Hoguet Newman Regal & Kenney LLP, counsel for Crossclaim  
Defendants Viktor and Ilyas Khrapunov (the “Khrapunovs”) in the above-captioned case.
2. I submit this declaration in support of the Khrapunovs’ motion to dismiss the  
Crossclaims.

3. Attached hereto as Exhibit A is a true and correct copy of the U.S. State Department's 2015 Human Rights Report for Kazakhstan.

Dated: August 17, 2016  
New York, New York

/s/ John P. Curley  
John P. Curley  
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*Counsel for Viktor Khrapunov and  
Ilyas Khrapunov*